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8
9 **UNITED STATES BANKRUPTCY COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12 **In re:**

13 **PG&E CORPORATION,**

14 **- and -**

15 **PACIFIC GAS AND ELECTRIC**
16 **COMPANY,**

17 **Debtors.**

- 18 ☐ Affects PG&E Corporation
19 ☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

20 ** All papers shall be filed in the Lead Case, No.*
21 *19-30088 (DM).*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**REORGANIZED DEBTORS' REPORT ON
RESPONSES TO TENTH OMNIBUS
OBJECTION TO CLAIMS (PLAN
PASSTHROUGH ENVIRONMENTAL
CLAIMS) AND REQUEST FOR ORDER BY
DEFAULT AS TO UNOPPOSED
OBJECTIONS**

[Re: Dkt. No. 8988]

**Resolving Objections Set for Hearing
October 13, 2020 at 10:00 a.m. (Pacific Time)**

1 **REQUEST FOR ENTRY OF ORDER BY DEFAULT**

2 PG&E Corporation (“**PG&E Corp.**”) and Pacific Gas and Electric Company (the “**Utility**”), as
3 debtors and reorganized debtors (collectively, “**PG&E**” or the “**Debtors**” or as reorganized pursuant to
4 the Plan (as defined below), the “**Reorganized Debtors**”) in the above-captioned chapter 11 cases (the
5 “**Chapter 11 Cases**”) hereby request, pursuant to Rule 9014-1(b)(4) of the Bankruptcy Local Rules for
6 the United States District Court for the Northern District of California, as made applicable to these
7 Chapter 11 Cases by the *Second Amended Order Implementing Certain Notice and Case Management*
8 *Procedures*, entered on May 14, 2019 [Dkt No. 1996] (“**Case Management Order**”), that the Court
9 enter an order by default on the *Reorganized Debtors’ Tenth Omnibus Objection to Claims (Plan*
10 *Passthrough Environmental Claims)* [Docket No. 8988] (the “**Tenth Omnibus Objection**”).

11 **RELIEF REQUESTED IN THE TENTH OMNIBUS OBJECTION**

12 The Tenth Omnibus Objection seeks to disallow and expunge the Proof(s) of Claim listed in the
13 column headed “Claims to be Expunged” in Exhibit 1 to the Tenth Omnibus Objection.

14 **NOTICE AND SERVICE**

15 A *Notice of Hearing on Reorganized Debtors’ Tenth Omnibus Objection to Claims (Plan*
16 *Passthrough Environmental Claims)* was filed concurrently with the Tenth Omnibus Objection on
17 September 3, 2020 [Docket No. 8991] (the “**Notice of Hearing**”). The Tenth Omnibus Objection, the
18 supporting declaration of David Kraska [Docket No. 8990], and the Notice of Hearing were served as
19 described in the *Certificate of Service of Andrew G. Vignali*, filed on September 15, 2020 [Docket No.
20 9044] (the “**Certificate of Service**”). As further described in the Certificate of Service, on September
21 4, 2020, each Proof of Claim listed on Exhibit 1 to the Tenth Omnibus Objection received the *Notice of*
22 *the Reorganized Debtors’ Tenth Omnibus Objection to Claims (Plan Passthrough Environmental*
23 *Claims)*, customized to include the claim number, debtor, claim amount and priority, and the basis for
24 objection of the disallowed claim, and claim number and claim amount and priority of the surviving
25 claim for each counterparty.

26 The deadline to file responses or oppositions to the Tenth Omnibus Objection has passed. The
27 Reorganized Debtors have received the following formal and informal responses:

Docket No.	Claimant	Claim No.	Resolution
Informal	California Air Resources Board	73078	Claimant has not objected to the expungement of this Claim. However, Exhibit 1 has been updated to reflect that the Claim is for \$9,011,210.
Informal	Dan Clarke	66542 67768	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to October 9, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on October 28, 2020, at 10:00 a.m.
Informal	San Francisco Herring Association	68099 67904	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to October 9, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on October 28, 2020, at 10:00 a.m.
Informal	Laura Hart	66588 67769	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to October 9, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on October 28, 2020, at 10:00 a.m.
Informal	Jeff and Lindsay Jurow	66940 66280 61436 65933	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to October 9, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on October 28, 2020, at 10:00 a.m.
Informal	Dennis Caselli	67764 67765	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to October 9, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on October 28, 2020, at 10:00 a.m.
Informal	Brian and Susan Keene	66354 66671	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to October 9, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on October 28, 2020, at 10:00 a.m.

Docket No.	Claimant	Claim No.	Resolution
Informal	Negar Rajabi	67017 66097	The Reorganized Debtors are attempting to resolve this matter consensually, and have agreed to an extension of Claimant's response deadline to October 9, 2020. If the objection cannot be resolved, it will be continued to the next omnibus hearing, on October 28, 2020, at 10:00 a.m.

DECLARATION OF NO OPPOSITION RECEIVED

The undersigned hereby declares, pursuant to 28 U.S.C. § 1746, under penalty of perjury that:

1. I am an attorney with the law firm of Keller Benvenuti Kim LLP, co-counsel for the Reorganized Debtors

2. I have reviewed the Court's docket in the Chapter 11 Cases and have determined that no response has been filed with respect to the Tenth Omnibus Objection except as described herein.

3. This declaration was executed in San Francisco, California.

WHEREFORE, the Reorganized Debtors hereby request entry of an Order disallowing and expunging the Proofs of Claims listed in the column headed "Claims to be Expunged" in **Exhibit 1** to this Request, which listed Claims are identical to those listed in Exhibit 1 to the Tenth Omnibus Objection, except as otherwise discussed above.

Dated: October 5, 2020

KELLER BENVENUTTI KIM LLP

By: /s/ Dara L. Silveira
Dara L. Silveira

Attorneys for Debtors and Reorganized Debtors